

# LANDMAN CORSI BALLAINE & FORD P.C.

A NEW YORK PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

CHRISTOPHER S. KOZAK  
MEMBER  
EMAIL: ckozak@lcbf.com

ONE GATEWAY CENTER  
22ND FLOOR  
NEWARK, NJ 07102  
TELEPHONE (973) 623-2700  
FACSIMILE (973) 623-4496  
[www.lcbf.com](http://www.lcbf.com)

120 Broadway  
13th Floor  
New York, New York 10271  
Tel: (212) 238-4800  
One Penn Center  
1617 JFK Boulevard, Suite  
955  
Philadelphia, PA 19103  
Tel: (215) 561-8540  
300 Delaware Avenue  
Suite 210  
Wilmington, DE 19801  
Tel: (302) 514-6901

August 6, 2024

**VIA ECF**

Hon. Valerie Figueredo  
United States Courthouse  
500 Pearl Street  
New York, New York 10007  
[FigueredoNYSDchambers@nysd.uscourts.gov](mailto:FigueredoNYSDchambers@nysd.uscourts.gov)

**MEMO ENDORSED**



HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE  
DATED: August 8, 2024

The briefing schedule requested herein is granted. The deadline for A-I-I to file its Opposition is September 13, 2024 and the deadline for Plaintiff's Reply is October 9, 2024.

**Re:     *Brian Joseph Gref v. American International Industries, et al.***  
**Case No.: 1:20-cv-05589-GBD-VF**

Dear Judge Figueredo:

This office represents defendant American International Industries (“A-I-I”) in the above-entitled action. We respectfully submit this correspondence with regard to Plaintiff’s Motion to Dismiss (ECF No. 448), filed on July 31, 2024. As you will recall, this is the matter which was conferred in-person on July 18, 2024. There are several additional issues that need to be addressed in response to Plaintiff’s Motion.

We have conferred with Plaintiff’s counsel, Olivia Kelly of Simmons Hanly Conroy, regarding a briefing schedule relative to this Motion. We proposed the following briefing schedule:

- **September 13, 2024:** A-I-I Opposition to be filed
- **October 9, 2024:** Plaintiff’s Reply in further support of his MTD to be filed

Plaintiff has not agreed with these dates. We ask the Court to approve the above schedule despite Plaintiff’s lack of consent. Thank you in advance for considering this request.

Respectfully,



Christopher S. Kozak

cc:     Olivia Kelly, Esq.